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January 22, 2025

VIA ECF

Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ramon Perez, 22 Cr. 622 (AT)

Dear Judge Torres,

I represent Ramon Perez in the above-referenced matter and submit this letter to respectfully request a modification to the terms of Mr. Perez's bond to permit Mr. Perez to move his permanent residence from the Southern District of Florida to the Western District of North Carolina. We have conferred with both the government as well as Pretrial Services and they have no objection to this request.

Since the beginning of this case, Mr. Perez has sold his family's home and has moved in with a family friend in the Southern District of Florida. Also, during the pendency of this case, Mr. Perez's wife instituted a trial separation from Mr. Perez. Mr. Perez's wife moved with their young son to Charlotte, North Carolina, where they have established permanent residence. The Court recently granted a request to permit Mr. Perez to travel to North Carolina for the dual purpose of seeing his son and also to attempt to repair his marriage (Doc. 155). During that visit, Mr. Perez and his wife determined to end their separation and dedicate themselves to working on their marriage, together.

Accordingly, we request that Mr. Perez be permitted to make arrangements to move permanently to resume living with his wife and son in Charlotte, North Carolina (Western District of North Carolina). Should the Court grant the present request, Mr. Perez will keep his Pretrial Services officer entirely abreast of all details of his move.

GRANTED.

SO ORDERED.

ANALISA TORRES
United States District Judge

Dated: January 23, 2025
New York, New York